

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SENECA INSURANCE COMPANY, )  
As subrogee of SURFSIDE )  
CONDOMINIUM ASSOCIATION, )

Plaintiff, )

vs. )

BROAN-NUTONE, LLC )

Defendant. )

05 CV 11401-MLW

FILED  
SEPT # 46558  
DOLLARS 50.00  
CITY CLK  
9/1/05

PLAINTIFF'S MOTION FOR ADMISSION OF INGA L. PARSONS  
*PRO HAC VICE* WITH ASSENT OF DEFENDANT

NOW COMES, Michael S. Field, Esq. of Field & Schultz, Counsel for Plaintiff Seneca Insurance Company, and respectfully moves this Court for an Order Admitting Inga L. Parsons, *Pro Hac Vice*, to practice before this Court in this proceeding. As grounds therefore, and pursuant to U.S.D.C.L.R. 83.5.3(b) movant states:

1. Ms. Parsons' address and telephone numbers are as follows:

Inga L. Parsons  
5 Bessom Street, #234  
Marblehead, MA 01945  
Telephone: (781) 581-2262  
Facsimile: (781) 842-1430

2. Ms. Parsons is a member in good standing of the New York State Bar and has been a member since July 1990 continuously to the present date, without suspension or disciplinary action of any nature whatsoever. Ms. Parsons has also been a member in good standing of the bar of the United States District Court for the Southern District of New York since October 1990 and the Eastern District of New York since January 1996.

She is also a member in good standing with the United States Court of Appeal for the District of Columbia Circuit since May 2005 and the Supreme Court of the United States since May 1996. Ms. Parsons is finalizing her application for admission to the bar of the State of Massachusetts and upon admission will move for admission to this Court directly.

3. As set forth in Ms. Parsons' certification attached hereto, there are no disciplinary proceedings pending against her as a member of the bar in any jurisdiction and she is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

4. Ms. Parsons' legal practice focuses on criminal and civil law, and she has experience in the areas of law presented by the above-entitled matter. In 1989, she graduated from Columbia University School of Law and received a degree of Juris Doctor. In 1990 she clerked for a Federal Judge in the United States District Court for the Central District of California and was an Assistant Federal Defender in the Southern District of New York for five years. Thereafter, Ms. Parsons was a clinical law professor at New York University School of Law for seven years. Since August 2004, Ms. Parsons has been of counsel to a law firm in Wyoming where she has been involved in many civil matters and has been admitted to appear Pro Hac Vice before the United States District Court for the District of Wyoming. Ms. Parsons has acquainted herself with the Local Rules of this Court and with the Federal Rules of Civil Procedure and Federal Law and will diligently and aggressively pursue the claims of the Plaintiff in the above-entitled matter.

5. Ms. Parsons has been known to the undersigned counsel since 1988, thus, counsel can vouch for the good moral character and veracity of Ms. Parsons.

6. The undersigned has entered a notice of appearance in this matter and is admitted to practice in the United States District Court for the District of Massachusetts. Undersigned counsel will actively participate in all aspects of this litigation, unless otherwise excused, and is fully prepared to represent the client at any time, in any capacity.

WHEREFORE, Counsel prays for an Order Admitting Inga L. Parsons *Pro Hac Vice* for this proceeding. A proposed Order is attached.

DATED this 30<sup>th</sup> day of August, 2005.

Respectfully submitted,

Seneca Insurance Company, Plaintiff,  
By its attorney,

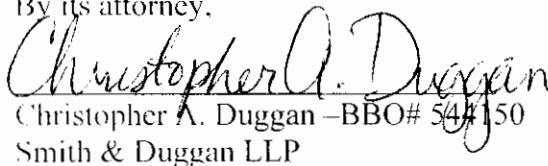


Michael S. Field -BBO#164600

Field & Schultz  
183 State Street, 2<sup>nd</sup> Floor  
Boston, MA 02109  
(617) 723-3900

ASSENTED TO:

Broan-Nutone LLC, defendant,  
By its attorney,



Christopher A. Duggan -BBO# 544150  
Smith & Duggan LLP  
Lincoln North  
55 Old Bedford Road  
Lincoln, MA 01773-1125  
(617) 228-4400

by Michael S. Field,  
duly authorized